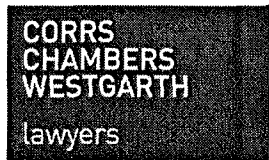


Our reference
PRM/JD/CATH4300-9006837
Your reference
114/04

Governor Phillip Tower
1 Farrer Place Sydney NSW 2000
GPO Box 9925 NSW 2001
Tel (02) 9210 6500
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Canberra
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28 September 2004

Mr David Begg
David Begg & Associates
GPO Box 2155
SYDNEY NSW 2001

Contact
John Dalzell (02) 9210 6160
Email: John.Dalzell@corrs.com.au

Partner
Paul McCann

Dear Mr Begg

John Andrew Ellis v His Eminence Cardinal George Pell & The Trustees of the Roman Catholic Church & Fr. Aidan Duggan

As you know, the return date for the application to extend the time limit for this claim is 25 October 2004. The plaintiff has not yet filed any evidence in support of this application. On this return date do you intend to move the court for relief or is it your expectation that further directions will be sought in relation to the future conduct of the application?

It is our contention that this application may take a number of days to determine and therefore will require a special fixture. We have taken steps to obtain further information in this case although we will require further time before we are in a position to proceed. To that end we will oppose any application to have this matter decided on 25 October 2004.

We intend to vigorously defend this claim, however we do not propose to file a full defence to the statement of claim until your application to extend the time limit has been determined. This letter will be produced in response to any attempt to enter judgment in default.

We request that the plaintiff provides us with the following documents:

- the plaintiff's full medical history including, but not limited to, the identity of all health professionals who saw the plaintiff from 1985 to the present date. Such information would include the identity of any general practitioner, specialist, psychiatrist, psychologist, counsellor, social worker and therapist that assessed and treated the plaintiff;
- the identity all of health professionals who saw the plaintiff's first wife during the period of ^{the} ~~there~~ marriage. Such information would include the identity of any general practitioner, specialist, psychiatrist, psychologist, counsellor, social worker and therapist that assessed and treated the plaintiff's first wife;
- any periods during which the plaintiff spent in hospital from 1974 to the present date;
- all documents produced by the plaintiff to Michael Ecclestone, independent assessor;

28 September 2004

David Begg & Associates

**John Andrew Ellis v His Eminence Cardinal George Pell &
The Trustees of the Roman Catholic Church & Fr. Aidan
Duggan**



- all documents relating to the assessment, counselling and therapy provided by Fleur Bishop and John Hunter Murray including any letters of referral and instruction;
- all documents produced by the plaintiff in connection with 'the Beginning Experience' weekend retreat attended by the plaintiff in either 1996 or 1997;
- all documents produced by the plaintiff in connection with 'the Inner Child Workshop' supervised by Tony Trimmingham;
- all documents relating to the plaintiff's employment with Baker & McKenzie Lawyers, including all documents relating to the termination of this employment, any psychologist and psychiatric report on the plaintiff prepared for Baker & McKenzie Lawyers. Also all documents relating to disciplinary proceedings, warnings and admonishments whilst the plaintiff was in the employ of Baker & McKenzie Lawyers.

We would ask that we receive the above information at least 7 working days before the return date on 25 October 2004.

Yours faithfully
Corrs Chambers Westgarth

Paul McCann
Partner